

# BIOSOLIDS EMS MANUAL

## ELEMENT 14.0

### NONCONFORMANCE: PREVENTATIVE & CORRECTIVE ACTION



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REVISION	EFFECTIVE DATE	APPROVAL SIGNATURE
09	July 29, 2016	

#### **PURPOSE**

Element 14.0 develops procedures for identifying, investigating and taking corrective action(s) for nonconformance.

#### **SCOPE**

This procedure outlines preventive and corrective action(s) to address nonconformances identified during routine monitoring and measurement.

#### **KEY WORDS**

- Nonconformance
- Noncompliance
- Corrective Actions
- Preventative Actions

#### **RESPONSIBILITY**

Biosolids EMS Manager, Biosolids Manager (Contractor), Biosolids EMS Coordinator, Assistant Director (Pollution Control), Water Systems Superintendent, Assistant Water Systems Superintendent (Operations), Assistant Water Systems Superintendent (Maintenance), and the Pretreatment Manager are responsible for addressing and resolving nonconformance issues.

#### **PROCEDURE**

The Nonconformance and Corrective and Preventive Action element is an important key to continual improvement. In simple terms, when employees find elements of the environmental management system that deviate from the requirements, then it is necessary to determine the root cause, change the necessary operating procedures and objectives, change necessary training requirements, specify preventive measures and recommended solutions, and address any environmental impacts that may have occurred as a result of the problem.

#### **Nonconformance**

When a Nonconformance issue arises the following basic steps are taken:

1. Fill out a Corrective Action Notice (CAN)
2. Identify the problem.
3. Identify the root cause (investigate).
4. Develop a solution.
5. Implement the solution.
6. Document the solution.
7. Communicate the solution.
8. Include preventive measure steps to prevent a recurrence.
9. Include steps to mitigate any actual or potential significant environmental impacts.

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Each employee that works within the biosolids value chain possesses the ability to identify nonconformance issues. These individuals also have the best working knowledge of the tasks that they perform and can be relied upon to present possible solutions to the issues. When an employee encounters a nonconformance issue, he or she completes a Corrective Action Notice (CAN) form and submits the form to his or her supervisor. The supervisor then notifies the appropriate members of management and the Biosolids EMS Manager.

The Biosolids EMS Manager and the appropriate managers determine the best solution, identify the corrective actions needed (such as recommended changes to policies, programs, plans, operational controls, and monitoring and measurement procedures) and implement the solution to prevent future nonconformances.

#### **Tracking Corrective Action Notice Progress**

Open CANs will be reviewed on a quarterly basis in order to evaluate their status and make updates towards completion if applicable. After open CANs have been reviewed, the date of review and person responsible for the review will be recorded on the Corrective Action Notice Review sheet that is housed in the Corrective Action Notice Binder. Additional systems used to track progress in completing CANs and periodically updating their status to reflect completion includes:

- Biosolids Progress Meeting Minutes – The Long-Term Solids Dewatering, Processing and Disposal project progress meeting (Biosolids Progress Meeting) minutes include CAN status. These meetings are regularly scheduled (monthly).
- Corrective Action Notice (CAN) Master Listing - Once the CAN is closed out, the Biosolids EMS Coordinator records it in the electronic CAN Master Listing, files an electronic copy and files a hard copy in the Corrective Action Notice Binder.

During each Internal audit, as discussed in Element 16.0, the auditors evaluate all CANs from the previous reporting year (August 1-July 31) up to the date of the internal audit to ensure that each has been closed and the proposed solution has effectively resolved the issue. The auditors also check for similar issues within the biosolids value chain to prevent future nonconformance issues. If the Internal audit team finds other nonconformance issues during the audit, a CAN form is completed for each nonconformance to resolve the issue. The Internal audit team's findings are summarized in the annual EMS Performance Report (Element 15.0).

#### **Noncompliance**

When a Noncompliance issue arises, the same basic steps described above for nonconformance are taken to address the noncompliance.

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#### **REFERENCES**

- BMP Guidance Manual: <http://www.wef.org/Biosolids/page.aspx?id=7733>
- Code of Good Practice, (NBP): <http://www.wef.org/Biosolids/page.aspx?id=7733>
- Manual of Good Practice for Biosolids, (NBP): <http://www.wef.org/Biosolids/page.aspx?id=7733>
- SOP Creation/Revision/Updates – VCWRF SOP PLNT 01.001 Standard Operating Procedures, Biosolids SOP, Contractor SOPs

#### **EMS Cross References**

- Element 4.0 Legal and Other Requirements
- Element 10.0 Operational Control of Critical Control Points
- Element 13.0 Monitoring and Measurement
- Element 15.0 Biosolids Program and EMS Performance Report
- Element 16.0 EMS Internal Audit

#### **ATTACHMENTS**

- Corrective Action Notice template
- Corrective Action Notice Review sheet

#### **REVISION HISTORY**


Revision #	Date	Revision Description
09	07/29/2016	Merged element to new EMS format and updated procedure, updated CAN form, created CAN Review Sheet for CAN Binder
08	10/06/2014	Updated information regarding evaluation of CANs during internal audits
07	08/05/2013	Update references, included attachment list, updated Corrective Action Notice form
06	07/29/2011	Correct typographical errors and update procedures
05	11/16/2010	Update responsibilities & references
04	05/15/2008	Audit (YR2) 2007
03	06/29/2007	Audit (YR1) 2006
02	11/29/2004	2004 Issue
01	10/01/2004	Approval Draft
SR	01/30/2004	Issued for Status Review

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BIOSOLIDS EMS MANUAL ELEMENT 14.0: CORRECTIVE ACTION NOTICE			
		CAN#	
Completed by:		Department/Divisions	
Date:		Element/Locations	
Nonconformance issue      Major <input type="checkbox"/> Minor <input type="checkbox"/> Opportunity for Improvement <input type="checkbox"/>			
Description of problem			
Is this a recurring problem? [Explain]			
Root Cause			
Recommended solution and measures to prevent reoccurrence and mitigate potential significant environmental impacts			
Person Responsible for Action: _____			
Scheduled Completion Date: _____			
Actual Completion Date: _____			
Close Out date: _____			
Signature: _____			
Attachments: _____			
Issue Date: August 01, 2016		Element 14.0 / Page 1 of 1	

## The logo for Fort Worth Water. It features the words "FORT WORTH" in a blue, serif, all-caps font at the top. Below this text is a brown silhouette of a longhorn's head and horns, facing forward. At the bottom, the word "WATER" is written in the same blue, serif, all-caps font as "FORT WORTH".

**FORT WORTH.**  
WATER

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